

Ms. Catherine Mannion  
 Commission for Aviation Regulation  
 3rd Floor, Alexandra House  
 Earlsfort Terrace  
 Dublin 2

25<sup>th</sup> April 2019

**Re: Commission Paper CP1/2019 11 April 2019, Draft Decision on winter 2019 Coordination Parameters at Dublin Airport**

Dear Catherine,

Aer Lingus supports the recommendation by the CAR to amend Dublin airport runway parameters in accordance with Option 1 and to roll forward winter 2018 terminal limits and referral parameters. This is consistent with the recommendation of the Dublin Airport Coordination Committee which Aer Lingus also supported.

The initial daa wish list was split into two essential component parts:

**Option 1:** An additional total movement in each of the 0700, 1000 and 1700 hours and an additional departure in the 0700 and 1600 hours

**Option 2:** Rebalancing of one slot from 0800 hour to 0900 hour and two slots from 1100 hour to 1200 hour

It is important to Aer Lingus that capacity at Dublin Airport grows and that growth is sustainable. Aer Lingus supported Option 1 as this provided growth with limited increase in delays, whilst Option 2 increased both average and peak delays. Option 1 modelled results projected no increase in peak departure delays and a reduction in average departure delays whilst Option 2 increased delays in the critical midday period when longhaul services peak and first wave shorthaul flights return for second wave departures. Operational performance and reducing delays in this period is critical for hub connectivity.

**Departure Modelling**

HELIOS	Wish-list	Option 1 Growth only	Option 2 Rebalancing only
Average	15:32	15:08	15:38
Peak	25:13	25:13	26:18

NATS	Wish-list	Option 1 Growth only	Option 2 Rebalancing only
Peak	5:30	4:54	4:12

**Arrivals Modelling**

HELIOS	Wish-list	Option 1 Growth only	Option 2 Rebalancing only
Average	7:06	7:05	7:12
Peak	11:57	12:15	12:02

NATS	Wish-list	Option 1 Growth only	Option 2 Rebalancing only
Peak	9:36	9:00	9:30

In summary, Option 1 allows for the net growth sought by daa, without the unnecessary increases in average and peak taxi times contained within the original wish-list. daa also highlighted that apron refurbishment works that have taken place for the past three winter seasons are complete and up to 7 additional stands, in use during summers, will be available for winter operations.

Aer Lingus welcomes the CAR's decision not to take account of any improvements from the introduction of A-CDM. Dublin Airport is due to become an A-CDM certified airport by winter 2019. However, it would not be prudent to "bank" potential benefits from these process and procedural changes, unless and until there is demonstrable and sustained operation performance improvements.

Aer Lingus expects that the CAR will take the same pragmatic approach to future infrastructure developments and process changes (e.g. taxiway construction or aircraft spacing on the runway). Its summer time

Notwithstanding Aer Lingus remains extremely concerned that Dublin Airport declared capacity is running ahead of infrastructure provision.

Planned block times for winter 2019 based on winter 2018 performance have increased by between 5 and 10 minutes for a third of Aer Lingus flights, reflecting in part increased congestion at Dublin.

As Aer Lingus projected, operational performance in summer 2019 is already running behind the very poor summer 2018 with delays caused by lack of adequate airport facilities continuing to increase.

Unnecessary delays and poor operational performance will continue to impact on consumers and the environment until declared capacity and infrastructure supply are brought into balance.

Aer Lingus also noted repeated requests to reduce slot fragmentation at Dublin and reiterates its support for a process to be led by the coordinator to reduce slot fragmentation through voluntary moves. It may therefore be necessary for the airport to fund ACL for the additional resources that would be required to undertake the initial analysis required for such a process.

Terminal limits as proposed are more than sufficient to meet demand in Winter 19. The evidence suggests that the load factor underpinning terminal limits is correct. Average load factors at the airport for winter 2018 were 78%, against a planned assessment limit of 85%.

Nevertheless there are terminal infrastructure pinch points, in particular to the east side of Terminal 2 check-in. Aer Lingus welcomes plans to modernise check-in on the east side to match the self-service and self bag-tag facilities on the west side.

However, process efficiencies will only be realised if the carriers operating from the east side desks are required to adopt the self-service infrastructure.

Aer Lingus is available to discuss in more detail any of the issues raised in this response.

Yours sincerely,

*PP*   
Greg Kaldahl  
Chief Planning and Strategy Officer